

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case *Hugh A. Chairnoff, et al. v. Islamic Republic of Iran*, 1:18-cv-12370(GBD) (SN)))

**PLAINTIFF'S NOTICE OF MOTION FOR ENTRY OF PARTIAL
FINAL JUDGMENT FOR SOLATUM FOR NON-IMMEDIATE FAMILY MEMBER**

(*CHAIRNOFF/IRAN II*)

PLEASE TAKE NOTICE that, by and through her undersigned counsel and upon the accompanying Memorandum of Law, the Declaration of Joseph Peter Drennan executed on September 2, 2022, together with the Exhibits annexed thereto, and all prior pleadings and proceedings had herein, *Chairnoff/Iran* Plaintiff Jamie K. Hawkins respectfully moves this Court for an Order awarding:

- (1) solatium damages to Jamie K. Hawkins for the losses she suffered as a stepdaughter of the late Geoffrey E. Guja in the same amount previously awarded to similarly-situated stepchildren of other decedents killed in the terrorist attacks on September 11, 2001; and
- (2) prejudgment interest on such damages at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and
- (3) permission for Jamie K. Hawkins to seek punitive damages or other damages at a later date; and
- (4) permission for all other *Chairnoff/Iran* Plaintiffs to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed; and
- (5) such other and further relief as this Honorable Court deems just and proper.

Ms. Hawkins's request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on October 5, 2021 (ECF 64 in 18-cv-12370 and ECF 7173 in 03-MDL-1570).

Dated: September 2, 2022
White Plains, New York

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